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Attorneys for Defendants

15 *Gary Piccinini, Bryan Shields, Dwight Neven,
16 Joel Tynning, Nevada Department of Corrections,
17 Jane Balao, Christopher Shields,
18 and Rosemarie McCrary*

19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 BONNIE LOPEZ, individually as sister
22 and Special Administrator for the Estate of
23 MELODY MORGAN, deceased; COLLEEN
24 LACKEY, individually as mother of
25 MELODY MORGAN, deceased,

26 Plaintiffs,

vs.

27 THE STATE OF NEVADA ex rel.
28 NEVADA DEPARTMENT OF
CORRECTIONS, WARDEN DWIGHT
NEVEN, individually; GARY PICCININI,
ASSISTANT WARDEN, individually;
BRYAN SHIELDS, individually; OFFICER
JOEL TYNNING, individually; OFFICER
KARISSA CURIER; OFFICER JAZMINA
FLANAGAN; NURSE JANE BALAO;
NURSE BRIGIDO BAYAWA; NURSE
LEILANI FLORES; NURSE ROSEMARY
MCCRARY; NURSE MA LITA
SASTRILLO; NURSE CHRIS SHIELDS;
DOES I through X; and ROE ENTITIES I
through X, inclusive,

Defendants.

Case No. 2:21-cv-01161-JAD-BNW

**STIPULATION FOR DISMISSAL
WITH PREJUDICE OF DEFENDANT
JOEL TYNING PURSUANT TO
FED. R. CIV. P. 41**

ECF No. 10

1 IT IS HEREBY STIPULATED between Plaintiffs Bonnie Lopez, individually as
2 sister and Special Administrator of the estate of Melody Morgan, and Colleen Lackey,
3 individually as mother of Melody Morgan (collectively “Plaintiffs”) and Defendant Joel
4 Tyning (sued as “Joel Tynning”), by and through their undersigned counsel of record, that
5 all Plaintiffs’ claims against Joel Tyning in this case are and shall hereby be dismissed with
6 prejudice, with each party to bear his, her, or its own attorneys’ fees and costs.

7 DATED this 14th day of July, 2021.

8 AARON D. FORD
9 Attorney General

10 By: /s/ Akke Levin
11 Akke Levin (Bar No. 9102)
12 Senior Deputy Attorney General
13 Katlyn Brady (Bar No. 14173)
14 Senior Deputy Attorney General
15 *Attorneys for Defendants*

DATED this 14th day of July, 2021.

CLARK HILL, LLP

16 By: /s/ Paola Armeni
17 Paola Armeni (Bar No. 8357)
18 3800 Howard Hughes Pkwy., Ste. 500
19 Las Vegas, NV 89169
20 *Attorneys for Plaintiffs*

14 ORDER

15 Based on the parties' stipulation [ECF No. 10], and with good cause appearing, IT IS
16 HEREBY ORDERED that ALL CLAIMS AGAINST Joel Tyning, sued as “Joel Tynning,” are
17 DISMISSED with prejudice, each side to bear its own fees and costs.

18 
19 U.S. District Judge Jennifer A. Dorsey
20 Dated: July 22, 2021